

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

JOSEPH MOORE JR.

Case No. Case: 2:22-mj-30014
Assigned To : Unassigned
Assign. Date : 1/7/2022
Description: CMP USA v. Moore (jo)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 15, 2019 - December 12, 2019 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section
18 U.S.C. § 1343

Offense Description
Wire Fraud

This criminal complaint is based on these facts:
SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: January 7, 2022

City and state: Detroit, Michigan

Danielle Stefanovski
Complainant's signature

Special Agent Danielle Stefanovski, ATF
Printed name and title

Jonathan J.C. Grey
Judge's signature

Hon. Jonathan J.C. Grey, U.S. Magistrate Judge
Printed name and title

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA

v.

JOSEPH MOORE JR.,

Defendant.

Case No.

UNDER SEAL

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Special Agent Danielle Stefanovski, being first duly sworn,
hereby depose and state as follows:

INTRODUCTION

1. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) since March of 2018. I am an “investigative or law enforcement officer of the United States” within the meaning of 18 U.S.C § 2510(7), and I am empowered by law to conduct investigations and make arrests for criminal offenses enumerated under federal law.

2. Prior to becoming a Special Agent with ATF, I was a Special Agent with the United States Secret Service. I have had extensive law enforcement training, including the Criminal Investigator Training

Program at the Federal Law Enforcement Training Center, USSS Special Agent Training Program in Beltsville, Maryland, and ATF Special Agent Basic Training in Glynco, Georgia. I also have a Bachelor of Business Administration from the University of Michigan.

3. During my employment with ATF, I have participated in numerous criminal investigations focused on firearms, firearms traffickers, armed drug traffickers and criminal street gangs. During said employment, I have utilized a variety of investigative techniques and resources, including physical and electronic surveillance, undercover and various types of informants and cooperating sources.

4. The facts set forth herein include my personal knowledge and/or information from other law enforcement officers. I have not included each and every fact known to law enforcement concerning this investigation; rather, I have set forth only the facts necessary to establish probable cause Joseph MOORE Jr. violated federal laws, including Title 18 U.S.C. § 1343- wire fraud.

PROBABLE CAUSE

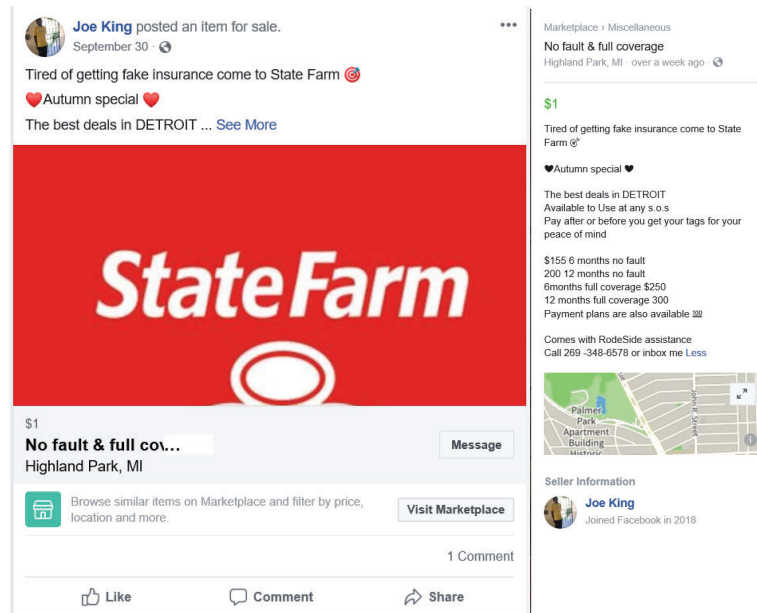
5. Since April 15, 2019, the ATF and the United States Attorney's Office (USAO) have been conducting an investigation of a

group of individuals involved with a Detroit Street Gang called the OES 187 Head Hunters (“OES”). The investigation was precipitated by two shooting incidents, which both occurred on April 15, 2019, on the Eastside of Detroit, Michigan, by members/associates of OES. The first shooting incident involved the OES 187 Head Hunters and a rival gang. The shooting incident occurred outside of a FedEx business which members of OES 187 Headhunters were present to collect suspected fraudulent motor vehicle insurance (“Shooting #1”). The second shooting occurred moments later when members/associates of OES fired several rounds from a 9mm firearm at two ATF Special Agents (“Shooting #2”), in an unmarked car, who were involved in an unrelated investigation in the area.

6. This investigation has revealed MOORE, along with other known OES members/associates, utilize social media and cellular phones to facilitate the sale of suspected fraudulent motor vehicle insurance and collect proceeds through the means of electronic money wiring such as Western Union and Cash App. MOORE also utilizes FedEx business facilities to print the suspected fraudulent motor vehicle insurance documents.

7. During the course of the investigation, ATF agents conducted a review of a return relating to MOORE's Facebook accounts (Federal Search Warrant #19-MC-50915), as well as an analysis of the contents of MOORE's cellular telephone (Federal Search Warrant #19-MC-50915-4). The following is a summary of the reviews:

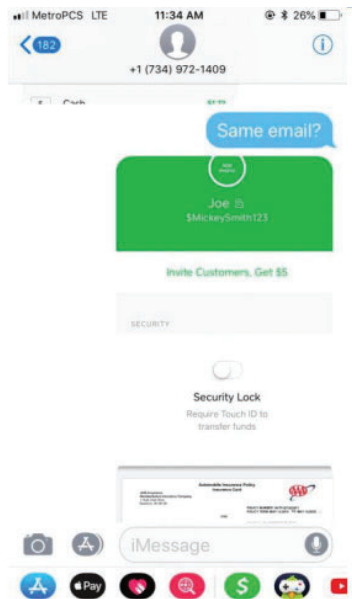
- a. On September 30, 2019, MOORE posted an advertisement to the Facebook Marketplace for State Farm insurance stating, "Tired of getting fake insurance come to State Farm, Autumn special, The best deals in DETROIT" and "No fault & full coverage."



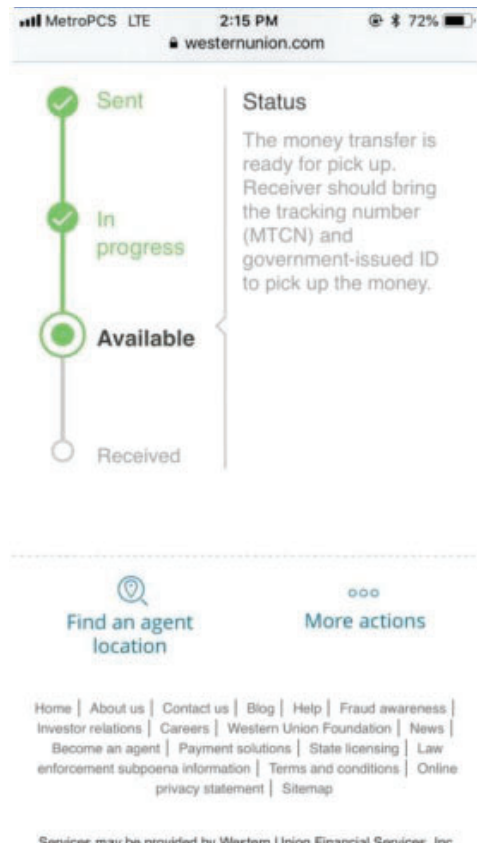
- b. On June 18, 2019, MOORE conducted a conversation with Facebook User N R 658304457 regarding

fraudulent motor vehicle insurance. The Facebook User N R stated, “I need 12 month no fault[fault] insurance today.” MOORE responded, “You got the registration or title for the car you want insurance on?” Facebook User N R stated, “Title”. MOORE responded, “I just need a picture of it is everything current on there?” Facebook User N R stated, “Yes...Whats the price?” MOORE responded, “✗ No fault 6months150\$ ✗ No fault 12months200\$ 1.944 / 3.028 Facebook Business Record Page 1945 ☒ Full coverage 6monsths 250\$ ☒ Full coverage 12months 300\$.”

- c. On June 15, 2019, MOORE sent a photograph depicting a screenshot of his CashApp account name to phone number 734-XXX-XXXX.



- d. On May 29, 2019, MOORE conducted a conversation with Facebook User D D (1251510217) regarding fraudulent motor vehicle insurance. Facebook User D D stated, “Hey are you still doing insurance?” MOORE responded, “Yes I’m.” Facebook User D D stated, “I just need no fault, so I can’t get a new plate and tags... What are ur prices?” MOORE responded, “150 6months no fault 175 12months no fault 250 6months full coverage 275 12months full coverage.”
- e. March 15, 2019, MOORE posted a screenshot depicting a Western Union confirmation. MOORE captioned the photograph- “I’m picking up.”



f. On February 15, 2019, MOORE posted to Facebook stating, “Aaa no fault & full coverage \$155 - Detroit, MI Tired of getting fake insurance come to AAA ❤️ Today’s specials ❤️ The best deals in DETROIT Available to Use at any s.o.s Pay after or before you get your tags for your peace of mind \$155 6 months no fault 200 12 months no fault 6months full coverage \$250 12 months full coverage 300 Payment plans are also available 🏠 Comes with RodeSide [Road Side] assistance Call 269 -

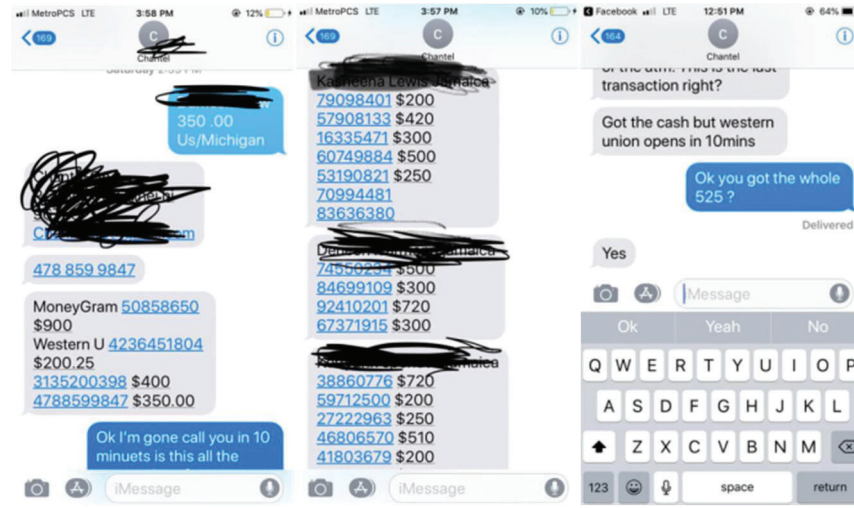
XXX-XXXX or inbox me.” The post was made with the following photograph.



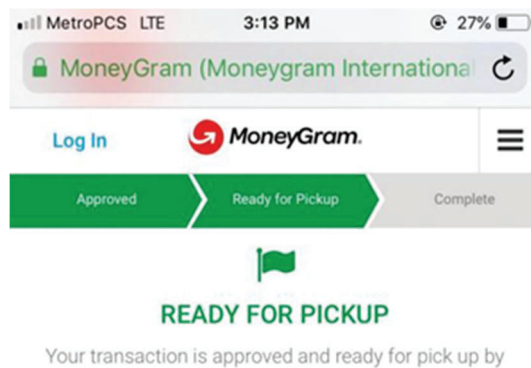
g. On October 19, 2018, MOORE posted to Facebook stating, “Aaa \$175 - Detroit, MI 150 6months no fault 175 12 months no fault 250 6months full coverage 275 12months full coverage.” The post was made with the following photograph, depicting apparent fraudulent insurance documents inside FedEx envelopes.



- h. On February 18, 2019, MOORE posted photographs depicting screenshots of information related to wire transfers.



- i. On August 24, 2018, MOORE posted a photograph depicting a “MoneyGram” captioned, “Yeah I still jugg (insurance fraud victim) run💪💪 good looking twin @[100001145481137:2048:MS].”



- j. On February 02, 2018, Joseph ELLINGTON, a.k.a. “Sleaz”, sent a Facebook message to MOORE stating, “The jugg [slang terminology for insurance customer/victim] think we scammed him cause you posted that shit na the whole gang tryna talk to him.”
- k. On December 28, 2017, MOORE posted a status update to Facebook stating, “Head hunter insurance company 🤝😎.”
- l. On December 03, 2017, MOORE posted a status update to Facebook stating, “Tracking transfers & Selling car insurance smoking grams my life 🍪🧨😎💯📖.”
- m. On November 29, 2017, MOORE conducted a conversation with Facebook user “Rest Up Baby KJ”. The Facebook User asked, “How, much we gotta give dog?” MOORE stated, “Half of every play...Half of w.e we charge.” The Facebook User stated, “150 so what we giving him outta that?” MOORE stated, “75...U gotta give him 75.”

n. On May 04, 2019, MOORE conducted a conversation with Cortez WORD.

i. MOORE stated, “We been scamming that bitch for a long ass time. This nigga Ant I guess the bitch, she had owed me some cheese [slang terminology for money] she owed me 700 she owed me 721 already. So you feel me where we left off type shit and then we aint talked to her since then. We had stopped hearing from that bitch like, you know how they be...We was getting them for some big amounts...I was going give Sleaz his little half of the cheese though...Then the lady she so sweet she so sweet she send me the receipt and everything...He had put it in Damesha’s [Damesha FEW] name.”

8. During the month of November 2019, ATF agents conducted interviews of a Source of Information (SOI) related to the OES 187 Head Hunter gang. The SOI provided ATF information regarding the OES gang activities, members and details surrounding the April 15,

2019 shooting incidents (previously identified as Shooting #1 and Shooting #2). The SOI provided information independently corroborated by agents to include facts related to the undercover purchase later discussed in the Affidavit. The SOI has been deemed credible and reliable by agents for the purposes of this investigation. The SOI informed the S/As of the following facts:

- a. The SOI stated MOORE, along with other members/associates of OES, were present at the FedEx Office Print & Ship Center on April 15, 2019 (prior to Shooting #1), located at 19040 Mack Avenue, Grosse Pointe, MI 48236, for the purpose of picking up suspected fraudulent motor vehicle insurance documents.
 - i. This information was corroborated by a review of security footage from the abovementioned FedEx Office Print & Ship Center on April 15, 2019. The security footage (shown below) depicts Joseph MOORE wearing a “Tiger Shark Mouth” hooded sweatshirt, along with other suspected OES

members, assaulting a black male in the FedEx store.

- b. The SOI informed S/As that multiple OES gang members sell fraudulent motor vehicle insurance.
- c. The SOI identified Joseph MOORE as a member of OES.
- d. The SOI stated MOORE taught several OES members how to sell fraudulent insurance documents.
- e. The SOI stated MOORE receives a “cut” (in reference to a portion of the proceeds) related to several of the fraudulent insurance document sales because he would do all of the paperwork.
- f. The SOI informed S/As OES members commonly refer to the sale of fraudulent motor vehicle insurance as a “Play.”
 - i. Law enforcement was able to corroborate this information through a review of Federal Search Warrant #19-50915-2 return related to the Facebook account of suspected OES associate

Damesha FEW. This return revealed on April 15, 2019, FEW sent a message stating, “Can you watch AJ while we go do this play?”

- g. The SOI stated MOORE had most of the “plays.”
- h. The SOI stated MOORE was living off the proceeds of selling fraudulent insurance documents.
- i. The SOI informed S/As that MOORE would facilitate the sales through Facebook.
- j. The SOI stated MOORE obtains the insurance forms online and fills in the applicable information.
- k. Once the form is complete with the customer/victims information, MOORE emails the documents to FedEx where it is printed.
- l. The SOI stated MOORE would deliver the documents in person or electronically via email.
- m. The SOI stated MOORE collects the money through electronic means such as Western Union, Money Gram or Cash App or in person with cash.

n. The SOI stated MOORE would request people with a valid photo ID to collect the money from Western Union on his behalf, stating he/she did so for MOORE on multiple occasions.

9. During the course of this investigation, an undercover controlled purchase was conducted by ATF S/A Monfette, acting in and undercover capacity. S/A Monfette purchased fraudulent vehicle insurance documents from MOORE.

a. On December 12, 2019, S/A Monfette met with MOORE. During this meeting, MOORE gave S/A Monfette a brown FedEx envelope containing fraudulent motor vehicle insurance, in exchange for pre-recorded government funds. This brown FedEx envelope was similar to the envelopes mentioned above in paragraph 7, section (g).



CONCLUSION

10. Based on the above information, probable cause exists that Joseph MOORE violated Title 18 U.S.C. § 1343- wire fraud, when he facilitated the sale of fraudulent motor vehicle insurance and collected proceeds through the means of electronic money wiring, such as Western Union and Cash App.

Danielle Stefanovski

Danielle Stefanovski, Special Agent
Bureau of Alcohol, Tobacco, Firearms
and Explosives

Sworn to before me and signed in my presence
and/or by reliable electronic means

Jonathan J.C. Grey

HON. JONATHAN J.C. GREY
United States Magistrate Judge

Dated: January 7, 2022